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8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 BENJAMIN GALECKI,

14 Defendant.

Case No. 2:15-cr-00285-APG-EJY-2

**Stipulation for Extension of Time
to File Defendant's Response to
the Government's Motion to
Substitute and Forfeit Property
(ECF No. 582)**

(Fourth Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between
18 Nicholas A. Trutanich, United States Attorney, and Daniel D. Hollingsworth,
19 Assistant United States Attorney, counsel for the United States of America, and
20 Rene L. Valladares, Federal Public Defender, and Amy B. Cleary, Assistant
21 Federal Public Defender, counsel for Defendant Benjamin Galecki, that Mr.
22 Galecki's Response to the Government's Motion to Substitute and Forfeit
23 Property currently due on April 12, 2021, be vacated, continued 45 days, and
24 reset for May 27, 2021.
25
26

1 This Stipulation is entered into for the following reasons:

2 1. The parties need additional time for government counsel to provide
3 defense counsel the necessary exhibits admitted during the forfeiture proceedings
4 on July 8, 2019. Defense counsel is unable to locate all of the necessary exhibits
5 in the material received from Mr. Galecki's former trial counsel. And
6 government counsel, given telework requirements and in-office staff limitations
7 in place due to the pandemic, requires additional time to locate and provide these
8 exhibits to defense counsel.

9 2. Additionally, the Ninth Circuit's recent decision on March 3, 2021,
10 in *United States v. Thompson*, 990 F.3d 680 (9th Cir. 2021), has substantially
11 altered defense counsel's Response to the government's Motion.

12 3. The parties agree to the continuance and extension of time.

13 This is the fourth request for an extension of time.

14 DATED this 8th day of April 2021.

15
16 RENE L. VALLADARES
Federal Public Defender

17 /s/ Amy B. Cleary
18 By _____

19 AMY B. CLEARY
Assistant Federal Public Defender

NICHOLAS A. TRUTANICH
United States Attorney

/s/ Daniel D. Hollingsworth
By _____

DANIEL D. HOLLINGSWORTH
Assistant United States Attorney

21 **IT IS SO ORDERED:**

22
23 
24 _____
UNITED STATES DISTRICT JUDGE

25 DATED: April 9, 2021